

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)

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In re:	)	
	)	Chapter 11
	)	
KH FUNDING CO.,	)	Case No. 10-37371 (TJC)
	)	
Debtor.	)	

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**NOTICE OF POST-CONFIRMATION DEBTOR'S SECOND OMNIBUS OBJECTION  
TO CERTAIN (A) DUPLICATE CLAIM, (B) INTERESTS, (C) SATISFIED CLAIMS,  
(D) NO LIABILITY CLAIM, AND (E) REDUCED CLAIM**

**PLEASE TAKE NOTICE** that KH Funding Co., the post-confirmation debtor in the above-captioned case (the "Debtor"), by and through its undersigned counsel, filed an omnibus objection (the "Objection") to certain (A) duplicate claim, (B) interests, (C) satisfied claims, (D) no liability claim, and (E) reduced claim. The Objection is appended to this Notice and it titled *Post-Confirmation Debtor's Second Omnibus Objection to Certain (A) Duplicate Claim, (B) Interests, (C) Satisfied Claims, (D) No Liability Claim, and (E) Reduced Claim* [Filed April 23, 2021].

**PLEASE TAKE FURTHER NOTICE** that you have filed a claim, or the Debtor scheduled a claim held by you (as shown on Exhibits A, B, C, D, and/or E to the Objection), to which the Debtor has filed the Objection. **YOUR CLAIMS MAY BE DISALLOWED, EXPUNGED, OR OTHERWISE AFFECTED AS A RESULT OF THE OBJECTION, THEREFORE, YOU SHOULD READ THIS NOTICE AND THE OBJECTION CAREFULLY.**

**Procedures for Responding to the Objection**

To contest the Objection, you must file and serve a written response within thirty (30) days of the date of this Notice so that it is received no later than **4:00 p.m. ET, on May 24, 2021**, together with any documents and other evidence that you wish to attach in support of your claim, unless you wish to rely solely upon the proof of claim. The response must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Maryland (the "Clerk") at the following address:

Clerk, United States Bankruptcy Court for the  
District of Maryland  
Federal Courthouse  
6500 Cherrywood Lane, Suite 300  
Greenbelt, Maryland 20770

You must also serve your response upon the following counsel to the Debtor on or before the response deadline:

PACHULSKI STANG ZIEHL & JONES LLP  
Bradford J. Sandler (Bar No. 4142)  
Michael R. Seidl (Bar No. 3889)  
919 North Market Street, 17<sup>th</sup> Floor  
P.O. Box 8705  
Wilmington, DE 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
E-mail: [bsandler@pszjlaw.com](mailto:bsandler@pszjlaw.com)  
[mseidl@pszjlaw.com](mailto:mseidl@pszjlaw.com)

and

James E. Van Horn (Bar No. 29210)  
Barnes & Thornburg LLP  
1717 Pennsylvania Avenue, N.W.  
Suite 500  
Washington, D.C. 20006-4623  
Telephone: 202-371-6351  
Facsimile: 202-289-1330  
E-mail: [jvanhorn@btlaw.com](mailto:jvanhorn@btlaw.com)

Any such response to this Objection must contain, at a minimum, the following:

1. A caption setting forth the name of the Court, the name of the Debtor, the case number, and the title of the Objection to which the response is directed;
2. Your name, your claim number, and a description of the basis for the amount of the claim;
3. The specific factual basis and supporting legal argument upon which the party will rely in opposing the Objection;
4. Any supporting documentation, to the extent it was not included with the proof of claim previously filed with the Clerk, upon which the party will rely to support the basis for and amounts asserted in the proof(s) of claim;
5. The name, address, telephone number, and fax number of the person(s) (which may be you or your legal representative) with whom counsel for the Debtor should communicate with respect to the claim or the objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the claim(s) on behalf of the claimant(s).

If you fail to file and serve a timely response, the Debtor may present to the Court an appropriate order disallowing and expunging your claim without further notice to you or a hearing.

**Additional Information**

**PLEASE TAKE FURTHER NOTICE** that questions regarding the amount of your claim as set forth above should be directed to Michael R. Seidl, Esquire, at PACHULSKI STANG ZIEHL & JONES LLP, the Debtor's counsel, by (i) e-mailing [mseidl@pszjlaw.com](mailto:mseidl@pszjlaw.com), or (ii) calling (302) 652-4100. Please have your proof(s) of claim and any related material available for any such discussion.

**PLEASE TAKE FURTHER NOTICE** that nothing in this Notice or the accompanying Objection is or shall be deemed to constitute a waiver of any rights of the Debtor (a) to dispute any claims, (b) to assert counterclaims, rights of offset or recoupment, or defenses to any claims, (c) to object to claims (or other claims or causes of action of a claimant or to claims on the Debtor's schedules) on any grounds, unless the Court has allowed a claim or ordered otherwise, or (d) to seek to estimate any claim at a later date. The Debtor reserves the right to assert additional objections to your proof(s) of claim.

Dated: April 23, 2021

PACHULSKI STANG ZIEHL & JONES LLP  
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and

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Counsel to the Post-Confirmation Debtor